

1 DANIEL F. POLSENBERG (SBN 2376)
2 J CHRISTOPHER JORGENSEN (SBN 5382)
3 ABRAHAM G. SMITH (SBN 13,250)
4 LEWIS ROCA ROTHGERBER CHRISTIE LLP
5 3993 Howard Hughes Parkway, Suite 600
6 Las Vegas, Nevada 89169-5996
7 (702) 949-8200
8 DPolsenberg@LewisRoca.com
9 CJorgensen@LewisRoca.com
10 ASmith@LewisRoca.com

11 *Attorneys for United Automobile
12 Insurance Company*

13 J CHRISTOPHER JORGENSEN (SBN 5382)
14 ABRAHAM G. SMITH (SBN 13,250)
15 LEWIS ROCA ROTHGERBER CHRISTIE LLP
16 3993 Howard Hughes Parkway, Suite 600
17 Las Vegas, Nevada 89169-5996
18 (702) 949-8200
19 CJorgensen@LewisRoca.com
20 ASmith@LewisRoca.com

21 *Attorneys for Lewis Roca Rothgerber Christie LLP, Daniel F. Polsenberg, J Christopher Jorgensen, Abraham Smith, and Matthew Tsai*

22 UNITED STATES DISTRICT COURT
23 DISTRICT OF NEVADA

24 THOMAS CHRISTENSEN, E.
25 BREEN ARNTZ, and GARY LEWIS,
26 Plaintiffs,

27 vs.

28 UNITED AUTOMOBILE
29 INSURANCE COMPANY; LEWIS
30 ROCA ROTHGERBER CHRISTIE;
31 DANIEL POLSENBERG; J.
32 CHRISTOPHER JORGENSEN;
33 ABRAHAM SMITH; MATTHEW
34 TSAI; WINNER & SHERROD f/k/a
35 ATKIN WINNER & SHERROD;
36 THOMAS E. WINNER; ROGERS
37 MASTRANGELO CARVALHO &
38 MITCHELL, LTD.; STEPHEN
39 ROGERS; and DOES I through V,
40 Defendants.

41 DONALD J. CAMPBELL (SBN
42 1216)
43 PHILIP R. ERWIN (SBN 11,563)
44 CAMPBELL & WILLIAMS
45 710 S. Seventh Street, Suite A,
46 Las Vegas, Nevada 89101
47 (702) 382-5222
48 DJC@cwlawlv.com
49 PRE@cwlawlv.com

50 *Attorneys for Winner & Sherrod
51 and Thomas E. Winner*

52 THOMAS F. CHRISTENSEN
53 (SBN 2326)
54 DAWN A. HOOKER (SBN 7,019)
55 CHRISTENSEN LAW OFFICES,
56 LLC
57 1000 S. Valley View Blvd.
58 Las Vegas, Nevada 89107
59 (702) 870-1000

60 *Attorneys for Plaintiffs Gary
61 Lewis, Christensen & Arntz*

62 Case No. 2:22-cv-02125-JAD-VCF

63 **STIPULATED MOTION AND ORDER TO
64 EXTEND DEADLINE:**

65 (1) **TO RESPOND TO MOTION
66 FOR REMAND (ECF No. 10)
67 (FIRST REQUEST)**

68 (2) **TO RESPOND TO MOTIONS
69 TO STRIKE, FOR EXCESS
70 PAGES, FOR EXTENSION OF
71 TIME, AND TO DISMISS (ECF
72 NOS. 13, 15, 16, 17, 21, 24,
73 25 & 29) (FIRST REQUEST)**

74 [ECF Nos. 31, 32]

1 The parties jointly move for and stipulate to an extension of deadlines on
2 certain pending oppositions pursuant to FRCP 6(c) and LR IA 6-1. Plaintiffs
3 filed a motion to remand (ECF No. 10) (the “motion to remand”) on January 20,
4 2023, serving the motion on defendants that same day. Defendants then filed
5 motions to dismiss under FRCP 12(b)(6) (ECF Nos. 15 & 16) and NRS 41.660
6 (ECF No. 21), a motion for leave to file excess pages (ECF No. 17 & 24), a mo-
7 tion to dismiss (or alternatively, to quash) under 12(b)(4) (ECF No. 25), a mo-
8 tion to strike the amended complaint (ECF No. 13), and a motion for a retroac-
9 tive extension of time (ECF No. 29) on January 25 and January 26, 2023, serv-
10 ing the motions on plaintiffs those same days. Plaintiffs filed a motion for stay
11 (ECF No. 30) on February 1, 2023, serving the motion on defendants that same
12 day.

STIPULATION

Plaintiffs and defendants have mutually agreed to two-week extensions on all the oppositions due to each of these now-pending motions, as follows:

1. A 14-day extension, through Friday, February 17, 2023, for defendants' opposition to plaintiffs' motion to remand (ECF No. 10).

2. A 14-day extension, through Thursday, February 23, 2023 for plaintiffs' oppositions to defendants' motions to strike (ECF No. 13), for leave to file excess pages (ECF Nos. 17 & 24), for a retroactive extension of time (ECF No. 29) and to dismiss the amended complaint under Rule 12(b)(4) (ECF No. 21), Rule 12(b)(6) (ECF Nos. 15 & 16), and NRS 41.660 (ECF No. 25).

POINTS AND AUTHORITIES

Under LR 7-2(a), “For all . . . motions [other than those related to summary judgment], the deadline to file and serve any points and authorities in response to the motion is 14 days after service of the motion.” Accordingly, defendants’ responses to the motions for remand is currently due February 3,

1 2023, respectively. Meanwhile plaintiffs' oppositions to the motions to dismiss
 2 are currently due February 8 and February 9, 2023.

3 Under FRCP 6(c) and LR IA 6-1, the parties mutually request an exten-
 4 sion of each of these deadlines by two additional weeks. Given such extensions:
 5 (a) defendants' opposition to the motion for remand will become due February
 6 17, 2023, and (b) plaintiffs' oppositions to the motions to dismiss will become
 7 due February 23, 2023.¹ This is the parties' first stipulation to extension of the
 8 deadlines for these oppositions. Defendants have previously moved for and suc-
 9 cessfully obtained an extension of time to file responsive pleadings and motions.
 10 (ECF Nos. 3 & 7.) Defendants have also filed a retroactive motion to extend
 11 time for filing the motions to dismiss by a few hours. (ECF No. 29.)

12 There is good cause for these extensions. Counsel most familiar with this
 13 matter at Lewis Roca is out-of-town and unavailable. Counsel for the Winner
 14 defendants has likewise been extraordinarily busy on multiple matters, includ-
 15 ing the joint responsive motions noted above. (ECF Nos. 13, 15, 16, 17, 21, 24,
 16 25 & 29.) Counsel for plaintiffs also agreed to this mutual extension because of
 17 the complexity of the motions to which they are responding. The additional
 18 time will enable all parties to provide this court with adequate briefing on the
 19 pending motions.

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28 ¹Defendants agree to extend to the latter of the two possible deadlines for the
 motions to dismiss.

1 Dated this 3rd day of February, 2023.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP

3 By: /s/Abraham G. Smith

4 DANIEL F. POLSENBERG (SBN 2376)
5 ABRAHAM G. SMITH (SBN 13,250)
6 J CHRISTOPHER JORGENSEN (SBN 5382)
7 3993 Howard Hughes Parkway Suite 600
8 Las Vegas, Nevada 89169
9 (702) 949-8200

10 *Attorneys for United Automobile
11 Insurance Company*

12 LEWIS ROCA ROTHGERBER CHRISTIE LLP

13 By: /s/Abraham G. Smith

14 J CHRISTOPHER JORGENSEN (SBN 5382)
15 ABRAHAM G. SMITH (SBN 13,250)
16 3993 Howard Hughes Parkway, Suite 600
17 Las Vegas, Nevada 89169-5996
18 (702) 949-8200

19 *Attorneys for Lewis Roca Rothgerber Christie
20 LLP, Daniel F. Polsenberg, J. Christopher
21 Jorgensen, Abraham Smith, and Matthew Tsai*

22 CAMPBELL & WILLIAMS

23 By: /s/ Phil R. Erwin

24 DONALD J. CAMPBELL (SBN 1216))
25 PHILIP R. ERWIN (SBN 11,563)
26 710 South Seventh Street, Suite A
27 Las Vegas, Nevada 89101
28 (702) 382-5222

29 *Attorneys for Winner & Sherrod
30 and Thomas E. Winner*

31 CHRISTENSEN LAW OFFICES

32 By: /s/ Dawn A. Hooker

33 DAWN A. HOOKER (SBN 7,019)
34 1000 S. Valley View Blvd.
35 Las Vegas, Nevada 89107
36 (702) 870-1000

37 *Attorneys for Plaintiffs Gary Lewis,
38 Christensen & Arntz*

ORDER GRANTING EXTENSION

2 Based on the parties' stipulation and good cause appearing, IT IS
3 ORDERED that the joint request for a two-week extension on deadlines for
4 oppositions to pending motions as listed in the stipulation [ECF Nos. 31, 32]
5 is **GRANTED**.

6 Defendants' opposition to plaintiffs' motion for remand (ECF No. 10) is
7 now due February 17, 2023.

8 Plaintiffs' oppositions to defendants' motions to strike and to dismiss the
9 amended complaint under Rule 12(b)(4), Rule 12(b)(6), and NRS 41.660 (ECF
10 Nos. 13, 15, 16, 17, 21, 24, 25 & 29) are now due February 23, 2023.

UNITED STATES DISTRICT JUDGE

2/6/23

14 || Submitted by:

15 | LEWIS ROCA ROTHGERBER CHRISTIE, LLP

18 By: /s/ Abraham Smith
19 DANIEL F. POLSENBERG (SBN 2376)
20 JOEL D. HENRIOD (SBN 8492)
21 ABRAHAM G. SMITH (SBN 13,250)
22 3993 Howard Hughes Pkwy, Suite 600
23 Las Vegas, NV 89169-5996

Attorneys for Defendants, Lewis Roca Rothgerber Christie LLP, Daniel F. Polsenberg, J. Christopher Jorgensen, Abraham Smith, and Matthew Tsai